

U.S. Environmental Protection Agency
Ground Water Office (WTR-9)
75 Hawthorne Street
San Francisco, CA 94105

ATTN: Nancy Rumrill

RE: Public Comments on Lahaina, HI WWRF UIC Permit Number HI50710003

Dear Ms Rumrill:

Thank you for the opportunity to comment on the proposed permit to inject wastewater from the Lahaina Wastewater Reclamation facility. The Maui Nui Marine Resource Council (MNMRC) is a broad-based community group working to apply ecological principles to education, research, and agency management like this, so that our nearshore waters will be restored with an abundance of sea life.

Our members and participants include fishermen, scientists, Hawaiian cultural practitioners, business people and residents who love Maui's coastal environment. Traditional Hawaiian belief honors our reefs. The *Kumulipo*, or creation chant, reveals our origin in the sea, and teaches that coral and other sea life is our family. The Council therefore asks that in considering the referenced permit, the EPA will include conditions to protect aquatic life and balanced aquatic ecosystems.

Our shallow coastal groundwater's effect on near shore marine waters is clearly evident—we can see groundwater (freshwater) seeping into the near shore environment. This visible seepage is typical of Hawaiian Islands hydrology. Given this interface between groundwater and marine, we maintain that any waste injection into groundwater must avoid any compromise of coastal water quality.

We understand the primary focus of the Underground Injection Control permit: to protect drinking water, as authorized by the Safe Drinking Water Act. We cannot ignore our marine ecosystems. We therefore respectfully oppose a permit that may comply with one federal law but is not compliant with another federal law. We ask that any permit issuance recognize the visible and intimate connection of these waters, and the potential for injected waste to negatively impact coastal waters—that would negatively impact our economy, our Hawaiian culture, our health and well being. We ask that EPA protect our ocean waters from degradation and comply with state water quality standards and the Clean Water Act.

It is increasingly evident that injected waste is damaging our near shore ecosystems. Resource managers at the Hawaii Department of Land and Natural Resources, Division of Aquatic Resources have reported to our Council on significant and dramatic decline of coral within the proximity of the county's three injection wells. It is our understanding that the Hawaii Department of Health has reported to EPA and to Congress, that coastal waters in the vicinity of the wells are impaired by pollutants known to be associated with sewage effluent. Researchers from the University of Hawaii Botany Department have reported to our Council that a direct connection can be made between the injected sewage and the invasive algae blooms in nearshore waters in the vicinity of the injection well plumes.

We ask that your permit include conditions to protect our groundwater sources for drinking water use, and all aquatic ecosystems that support cultural, fishing, and recreation.

We ask that you specifically include water-quality-based permit limits designed to achieve compliance with surface water quality standards in the coastal waters.

We ask that the permit be required to comply with any Total Maximum Daily Loads established to support attaining water quality standards.

We ask that EPA address comprehensive watershed planning to ensure that this and all decisions support clean and healthy near shore waters that we and our visitors can fish or swim in with no concern for health hazards: it is paramount that solutions are beneficial to all concerned.

Sincerely,

Ed Lindsey
Chair, MNMRC